

APPLICANT(S): BEN-CHORIN, Moshe et al.  
SERIAL NO.: 10/017,546  
FILED: December 18, 2001  
Page 19

### **REMARKS**

The present response is intended to be fully responsive to all points of objection and/or rejection raised by the Examiner and is believed to place the application in condition for allowance. Favorable reconsideration and allowance of the application is respectfully requested.

Applicants assert that the present invention is new, non-obvious and useful. Prompt consideration and allowance of the claims is respectfully requested.

### **Status of Claims**

Claims 1-74 are pending in the application, of which claims 1-46 and 59-74 are withdrawn from consideration.

Claims 47-58 have been rejected.

Claim 47 has been amended in this submission. The amendments to the claims add no new matter.

### **CLAIM REJECTIONS**

#### **35 U.S.C. § 103 Rejections**

In the Office Action, the Examiner rejected claims 47-49 and 52-58 under 35 U.S.C. § 103(a), as being unpatentable over Lind et al. (US 5,999,153) in view of Conner et al.(US Re 36,654) and Lin et al. (US 6,757,428). Applicants respectfully traverse this rejection in view of the remarks that follow.

Lind et al. discloses:

A display for soft proofing an image to be reproduced using a set of selected printing colors includes a plurality of display elements each for displaying a color substantially spectrally matched to one of a set of printing colors. (Abstract)

Specifically, Lind et al. discloses:

Generally, if a set of selected printing inks or colors are to be used to reproduce an image, a plurality of display elements in the form of the pigmented layers 23 are selected each for displaying a color substantially spectrally matched to one of the set of printing colors. (Column 4, lines 13-17)

However, pigmented layers 23 are subtractive color filters, which absorb a range of light wavelengths and transmit the color of the filter. The Lind reference teaches a stack of pigmented layers, each of which absorbs an amount of colored light. Therefore, Lind teaches a subtractive combination of colors. Accordingly, there is no teaching or disclosure in Lind of “a controller for determining an additive linear combination of said at least four primary colors according to said converted data for production by said light source” as recited in amended claim 47.

In fact, the present application discusses and distinguishes subtractive combination from additive combination of colors:

Hereinafter, the term “subtractive” refers to the creation of color by removing a portion of the spectrum of light transmitted to the eye, while the term “additive” refers to the creation of color by combining light of at least two spectra before transmission to the eye. (Paragraph [0045])

Subtractive color filters absorb significant portion of the light. Therefore, increasing the number of different subtractive color filters would cause an apparent loss of light. Accordingly, increasing the number of subtractive color filters would not have been obvious based on the Lind reference, as this would tend to produce a non-functioning device.

Conner et al. also teaches subtractive color filters:

Filters of the subtractive primary colors subtract one primary color and let the two others pass. For example, a cyan filter attenuates

red light and lets blue and green light pass. Similarly, a magenta filter attenuates green light and lets blue and red light pass. Finally, a yellow filter attenuates blue light and lets green and red light pass. (Column 6, lines 14-19)

The Lin et al. reference merely describes generally different known 3-D color spaces.

Therefore, none of Lind or Conner or Lin teaches an additive linear combination of at least four primary colors, as recited in amended claim 47. For example, the present application teaches, *inter alia*:

In an embodiment where six filters or primaries are used, transmission spectra produced by light passing through combinations of cyan, magenta, yellow, red, green and blue ink may be included, and a white spectrum may be produced by a linear combination of these spectra. Alternately, other linear combinations of primaries or filters may be used to produce required ink transmission spectra. Furthermore, other numbers of primaries may be combined to produce a white color. Fig. 10A depicts a set of four transmission spectra which may be used to reproduce a set of seven ink transmission spectra by linear positive combinations . . . (Paragraph [0104])

Therefore, none of Lind et al. or Conner et al. or Lin et al., alone or in combination, teach or suggest, *inter alia*, “a controller for determining an additive linear combination of said at least four primary colors according to said converted data for production by said light source”, as recited in claim 47, as amended.

Moreover, at least for the reasons stated above, it would not be obvious to include “a controller for determining an additive linear combination of said at least four primary colors according to said converted data for production by said light source” in Lind et al. based on the teachings of Connor or Lin. Thus, neither Lind et al. nor Conner et al. or Lin et al., alone

APPLICANT(S): BEN-CHORIN, Moshe et al.  
SERIAL NO.: 10/017,546  
FILED: December 18, 2001  
Page 22

or in combination, teach or suggest the invention of claim 47. Accordingly, amended independent claim 47 is allowable.

Claims 48, 49 and 52-58 depend from claim 47 and therefore include all the limitations of this claim. At least for this reason, claims 48, 49 and 52-58 are likewise allowable. Accordingly, Applicants respectfully request that the Examiner withdraw the rejections to amended independent claim 47 and to claims 48, 49 and 52-58 dependent thereon.

In the Office Action, the Examiner rejected claim 50 under 35 U.S.C. § 103(a), as being unpatentable over Lind et al. in view of Conner et al. and Lin et al. and further in view of Wang (US 6,278,540). Applicants respectfully traverse this rejection in view of the remarks that follow.

Claim 50 depend from claim 47 and therefore include all the limitations of this claim. For the reasons set forth above, claim 47 is allowable over Lind et al. in view of Conner et al. and Lin et al. Wang does not cure the deficiencies of Lind et al. described above. At least for this reason, claim 50 is likewise allowable. Accordingly, Applicants respectfully request that the Examiner withdraw the rejections to claim 50.

In the Office Action, the Examiner rejected claim 51 under 35 U.S.C. § 103(a), as being unpatentable over Lind et al. in view of Conner et al. and Lin et al. and further in view of Gransden et al. (US 6,404,970). Applicants respectfully traverse this rejection in view of the remarks that follow.

Claim 51 depend from claim 47 and therefore include all the limitations of this claim. For the reasons set forth above, claim 47 is allowable over Lind et al. in view of Conner et al. and Lin et al. Gransden et al. does not cure the deficiencies of Lind et al. described above. At least for this reason, claim 51 is likewise allowable. Accordingly, Applicants respectfully request that the Examiner withdraw the rejections to claim 51.

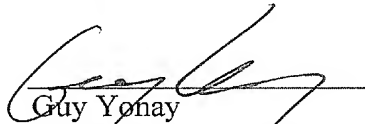
APPLICANT(S): BEN-CHORIN, Moshe et al.  
SERIAL NO.: 10/017,546  
FILED: December 18, 2001  
Page 23

In view of the foregoing amendments and remarks, the pending claims are deemed to be allowable. Their favorable reconsideration and allowance is respectfully requested.

Should the Examiner have any question or comment as to the form, content or entry of this Amendment, the Examiner is requested to contact the undersigned at the telephone number below. Similarly, if there are any further issues yet to be resolved to advance the prosecution of this application to issue, the Examiner is requested to telephone the undersigned counsel.

Please charge any fees associated with this paper to deposit account No. 50-3355.

Respectfully submitted,



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